

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

***IN RE: STATE ATTORNEYS GENERAL  
CASES STATE OF CONNECTICUT, ET AL V.  
SANDOZ, INC., ET AL.***

**CIVIL ACTION NO.: 20-3539**

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**THIS DOCUMENT RELATES TO:  
*State Attorneys General Litigation***

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**MDL 2724  
16-MD-2724**

**HON. CYNTHIA M. RUFÉ**

**Civil Action No. 20-3539**

**STIPULATED MOTION PURSUANT TO RULE 15 TO DISMISS SPECIFIC CLAIMS**

WHEREAS, Plaintiff States, Territories, and the District of Columbia filed an Amended Complaint in this action on September 9, 2021 (Dkt. No. 62, the “Amended Complaint”);

WHEREAS, the State of California (“California”) had not previously asserted claims in this action, but joined the Amended Complaint and asserted claims against the Defendants under federal and state law;

WHEREAS, among other causes of action, California brought claims assigned to it pursuant to California Government Code Sections 4552-54 by vendors and intermediaries that had purchased generic pharmaceuticals on behalf of California (Amended Complaint ¶ 2117, the “Assigned Claims”);

WHEREAS, California no longer wishes to continue to pursue the Assigned Claims and accordingly seeks to have them dismissed without prejudice;

WHEREAS, Federal Rule of Civil Procedure 15(a)(2) provides that the “court should freely give leave” to amend;

WHEREAS, Defendants do not object to California dismissing the Assigned Claims without prejudice;

WEHERAS, Defendants retain, and do not waive, any rights related to the Assigned Claims, including (a) the right to oppose any effort by California to re-assert these claims in the future; and (b) the right to seek discovery from California related to the Assigned Claims if California ever re-asserts them;

NOW THEREFORE, California and Defendants accordingly stipulate and move the Court to dismiss the Assigned Claims without Prejudice.

Dated: April 18, 2022

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**CERTIFICATION**

I hereby certify that on April 18, 2022, I caused the foregoing Stipulated Motion to be filed electronically with the Clerk of Court by using the CM/ECF system which will serve a copy on all interested parties registered for electronic filing, and is available for viewing and downloading from the ECF system.

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